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9 *ex rel. its Department of Corrections and*
Perry Russell

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

13 RON SCHRECKENGOST, an individual,
14 and ELIZABETH WALSH, an individual,

15 Plaintiffs,

16 v.

17 THE STATE OF NEVADA, *ex rel.* the
18 NEVADA DEPARTMENT OF
CORRECTIONS, and PERRY RUSSELL,
19 an individual,

20 Defendants.

Case No. 3:19-cv-00659-MMD-CLB

STIPULATION, REQUEST, AND
ORDER TO EXTEND TIME FOR
DEFENDANTS TO REPLY TO
PLAINTIFFS' OPPOSITIONS TO
MOTIONS TO DISMISS THE SECOND
AMENDED COMPLAINT
(ECF NO. 76 and ECF NO. 77)

(FIRST REQUEST)

21 Defendants, STATE OF NEVADA *ex rel.* its DEPARTMENT OF CORRECTIONS and
22 PERRY RUSSELL, and Plaintiffs, RON SCHRECKENGOST and ELIZABETH WALSH,
23 pursuant to LR IA 6-1, LR IA 6-2, by and through their counsel of record, hereby stipulate and
24 agree to a 14-day extension of time, up to and including December 22, 2020, for Defendants to
25 reply to Plaintiffs oppositions (ECF No. 76 and ECF No. 77) that were filed in response to
26 Defendants' motions to dismiss the Second Amended Complaint. Pursuant to this stipulation,
27 the parties request that the Court grant this 14-day extension. The current deadline for
28 Defendants to reply to Plaintiffs' oppositions is December 8, 2020.

1 This is the first request for an extension of time for Defendants to reply to Plaintiffs'
2 oppositions (ECF No. 76 and ECF No. 77) to Defendants' motions to dismiss.

3 Defendants were previously granted an 8-day extension of time for Defendants to
4 respond to Plaintiffs' Second Amended Complaint. ECF No. 6. The Court granted Plaintiffs a
5 21-day extension of time (ECF No. 72), an additional 10-day extension of time (ECF No. 74),
6 and an additional 1-day extension of time (ECF No. 79) to respond to Defendants' motions to
7 dismiss. ECF No. 12; ECF No. 18.

8 This request is based on good cause and not for purpose of delay. Defendants are
9 requesting additional time to file replies to Defendants' oppositions (ECF No. 76 and ECF No.
10 77) to the motion to dismiss the Second Amended Complaint to accommodate defense counsel's
11 pre-existing professional obligations in other legal matters, and because Defendants need
12 additional time to properly prepare their reply to adequately address the numerous and complex
13 legal issues raised in Plaintiffs' Oppositions. Undersigned counsel also needs additional time
14 due to and challenges currently created by the COVID-19 pandemic.

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Undersigned counsel is spending significant time assisting with child care and his child's school curriculum because the elementary school that his child attends moved to full distance learning for the dates of November 30, 2020 through December 18, 2020.

DATED: December 3, 2020

AARON D. FORD
Attorney General

THE GEDDES LAW FIRM, P.C.

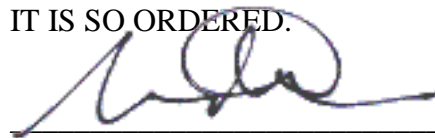
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and Elizabeth Walsh*

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

Dated: December 4, 2020